GYNW CONSULTING, INC.



8050 SW WARM SPRINGS STREET SUITE 200 P.O. BOX 2330 TUALATIN, OR 97062 TEL 503.612.4400 FAX 503.612.4401

June 16, 2015

REDACTED-FOR PUBLIC INSPECTION

VIA Courier

Marlene H. Dortch, Secretary Federal Communication Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: Confidential Financial Information Subject to Protective Order in WC Docket Nos. 14-58, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208. Before the Federal Communications Commission.

Form 481 - Carrier Annual Reporting Data Collection, 2015

Dear Ms. Dortch:

On behalf of Arctic Slope Telephone Association Cooperative, Inc. ("ASTAC"), GVNW Consulting, Inc. hereby submits the attached redacted and confidential versions of its "FCC Form 481 – Carrier Annual Reporting Data Collection" information pursuant to sections 54.313 and 54.422 of the Commission's rules, as filed with the Universal Service Administrative Company. A copy is also being submitted to the Public Utility Commission of Alaska.

ASTAC requests confidential treatment pursuant to sections 0.457 and 0.459 of the Commission's rules for 1) the Progress Report required by section 54.313(a)(1), 2) certain Broadband speeds noted on Line 711 required by section 54.313(a)(7) provided to commercial operations on the North Slope; 3) Financial Data required by section 54.313(f)(2) to be attached to this report, and as identified on Lines 3027-3024 of FCC Form 481. The information contained in the Progress Report, the Financials and on Line 711 contain competitively sensitive information that is secure from public access which could be used by a competitor to disadvantage or harm ASTAC.

Further, ASTAC requests confidential treatment pursuant to sections 0.457 and 0.459 of the Commission's rules for those items in the annual Board Meeting Minutes not related to the Tribal Engagement Obligation required by section 54.313(a)(9). As a matter of policy, the information contained in the Board Meeting Minutes is only available to the membership of the Cooperative, not the general public

In accordance with the Protective Order, two redacted copies marked "REDACTED – FOR PUBLIC INSPECTION" and one non redacted confidential version marked "CONFIDENTIAL – NOT FOR PUBLIC INSPECTION" are being filed with the Commission. A redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please contact me at 503-612-4418.

Sincerely,

GVNW Consulting, Inc.

Enclosures

cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies, confidential)
J. Smith, GVNW

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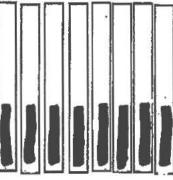
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54.313(a)(5) Satisfactions of Consumer Protection and Service Quality Standards

Consumer Protection

Voice and Broadband

Arctic Slope Telephone Association Cooperative, Inc. compiles with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions. This applies to all lines of business (voice, broadband, wireless and lifeline).

Service Quality Standards

Voice

Arctic Slope Telephone Association Cooperative, Inc. compiles with the service standards of the State of Alaska promulgated in Alaska Statues, Title 3 Commerce, Community, and Economic Development Part 7 Regulatory Commission of Alaska, 3 AAC 52.200-3, AAC 52.340, Telephone Utilities and Alaska Administrative Code 8 AAC 53.700 State Telecommunications (Modernization, This applies to all lines of business (voice, broadband, wireless and lifeline).

Broadband

Arctic Slope Telephone Association Cooperative, Inc. follows the service standards noted in NECA Tariff #5 and is committed to provide the highest service to its broadband customers.

Functionality in Emergency Situations

In 7 of our village locations (Point Hope, Point Lay, Wainwright, Atqasuk, Nuiqsut, Kaktovik and Anaktuvuk Pass) we have fully redundant Redcom local exchange switches. The central offices that these switches are installed in are equipped with back up batteries designed to support an 8 hour power disruption. In addition, each location has a standby generator that will come on line automatically in the event of the loss of commercial power. These generators are equipped with external fuel tanks that will provide for 4 or 5 days of unattended operation. We have village reps in these villages that can check the site during an emergency and have fuel delivered if necessary.

in our two largest exchanges, Barrow and Deadhorse we have fully redundant DMS 10 local exchange switches. The central offices these switches are installed in are equipped with back up batteries to support an 8 hour power disruption. In addition, each location has a standby generator that will come on line automatically in the event of loss of commercial power. These generators are equipped with external fuel tanks that will provide for 4 or 5 days of unattended operation. It addition these locations are manned 7 days a week for emergency response.

In both Barrow and Deadhorse we have battery back at all remote locations and any locations without permanent standby generators are supported by portable generators.

In all locations we work with the two long distance carriers to reroute traffic as required to recover from network outages or traffic spikes. We have redundant routes to both major carriers.

Arctic Slope Telephone Association Cooperative, Inc. Program Year 2016 PROGRESS REPORT ON SERVICE QUALITY IMPROVEMENT PLAN

PREAMBLE

This document is an integral part of the Arctic Slope Telephone Association Cooperative, Inc.'s (ASTAC) Program Year 2016 Annual Report, as attached to Form 481. It is in compliance with §54.313(a)(1) adopted in the FCC's USF/ICC Transformation Order (11-161) and incorporates all further clarifications identified in subsequent Reconsideration Orders, as applicable, that were in effect at the time the Annual Report was due by Rule, to the requisite regulatory authorities.

Arctic Slope Telephone Association Cooperative, Inc. advises that the environment in which ASTAC operates is dynamic, not static. As a result, certain network targets identified in its initial 5 Year Network Improvement Plan filed in 2014, may be modified in response to regulatory decisions that have been subsequently adopted, and as their implication upon ASTAC's financial viability in providing the required services and service level quality became known.

Modifications to the Network Improvement Plan may also have been taken due to changes in technology (vendor)-driven support, weather, or other emergency related contingencies.

Targets not met or changed since the initial 5 Year Network Improvement Plan filing are identified and reasons provided for those changes.

UNIVERSAL SERVICE SUPPORT RECEIVED IN 2015

Per the Universal Service Administrative Company (USAC), as available for the period up to this filing, Arctic Slope Telephone Association Cooperative, Inc. received a total of (as of 06/08/15) in USF support funds. The breakdown of the funding to the point of filing is:

- High Cost Loop Support

 Local Switching Support

 Connect America Fund-Intercarrier Compensation Support
 Interstate Common Line Support
- Interstate Common Line Suppe

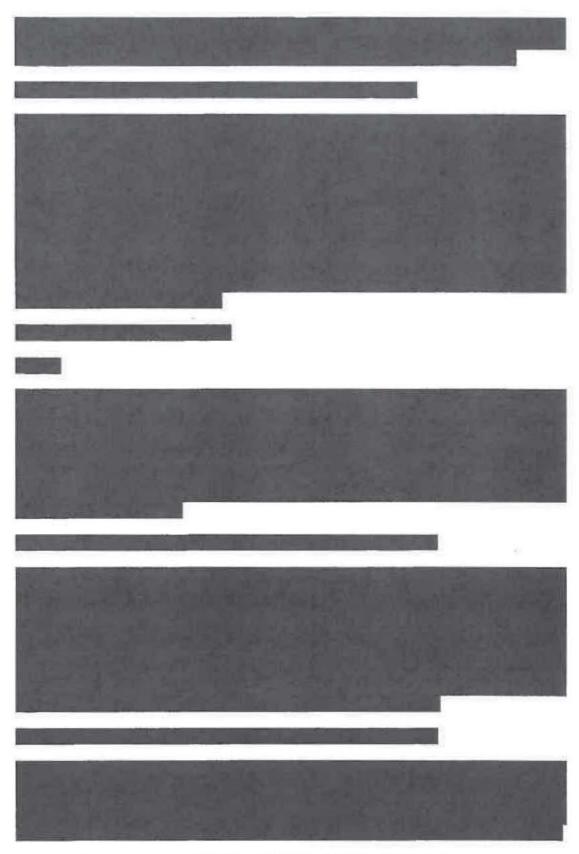
- Safety Net Additive

Universal Service Support funds are used to: 1) maintain, upgrade, and improve ASTAC's network and, 2) cover operating expenses and debt commitments as necessary to permit it to offer a high level of service for both voice and broadband within the authorized serving area.

USF support will continue to be included in ASTAC's current revenue accounts and forward-looking projections. Revenues, in the aggregate, are used for both capital expenditures as well as to cover operating expenses and fixed costs incurred to obtain capital from lenders. ASTAC does not segregate USF separately for purposes of capital and operating expenditures; USF is expended in the same proportion as its contribution is to ASTAC's aggregated revenue amount.

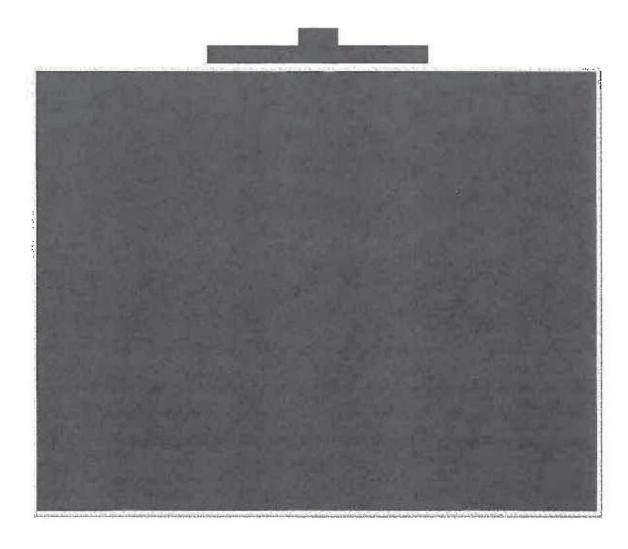
The proportionate share of USF expenditures in 2015 to date for CAPEX is estimated to be and for OPEX (). In the accompanying 2015 project detail, expenditures for network improvements sometimes involve service quality, coverage and capacity as an integrated improvement project and are not mutually exclusive from one another. In terms of cost, projects involving multiple qualifiers are of equal dollar equivalence. Where a project involves a single qualifier, it is so noted. In the Program Year 2015 filing, ASTAC reported the following: PROGRESS REPORT 2015

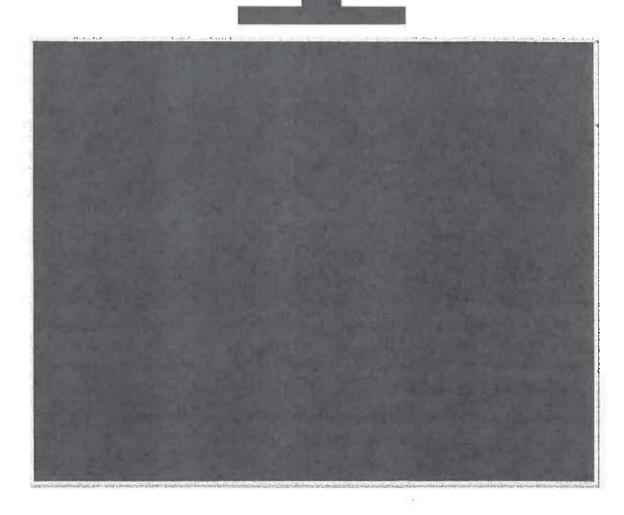
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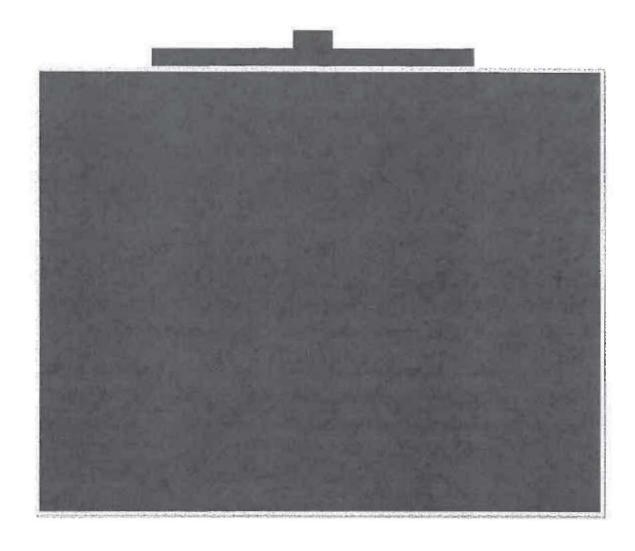


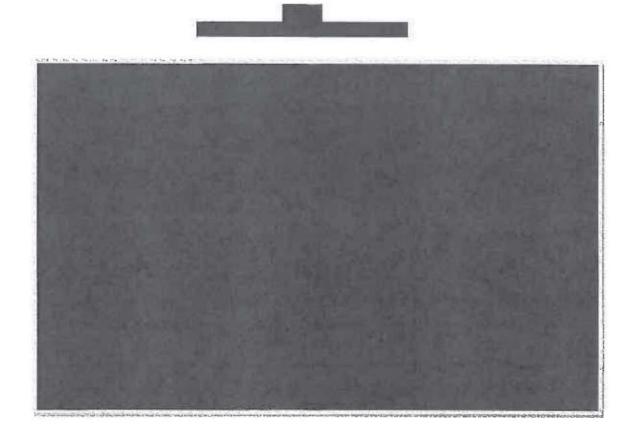
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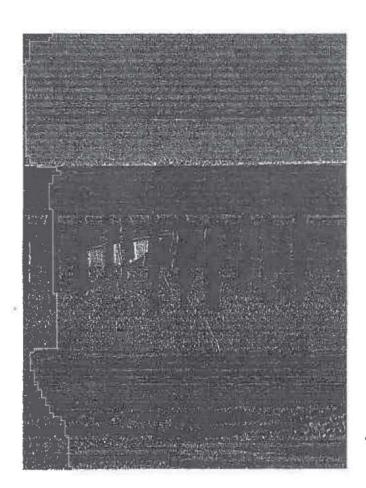




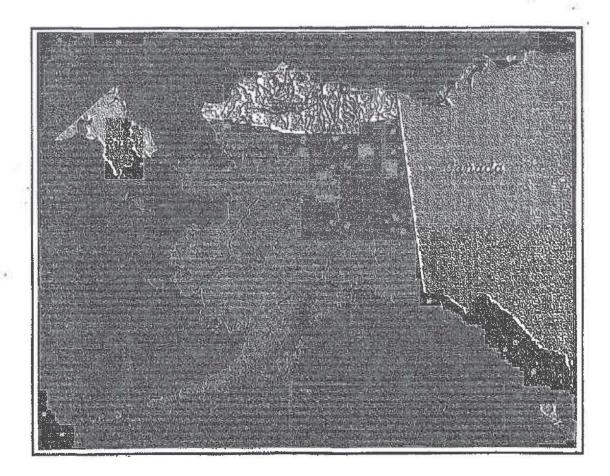




Arctic Slope Telephone Association Cooperative, Inc. Certification of Tribal Engagement For the Year Ending December 31, 2014



<u>Service Area Description:</u> Arctic Slope Talephone Association Cooperative, Inc. (ASTAC) serves the North Slope Region of Alaska. Our service area encompasses over 89,000 square miles and has seven traditional Native villages, the City of Barrow and the political of Prudhoe Bay scattered across that expanse. With the exception of Prudhoe Bay, which is built out from the terminus of the Dalton Highway, all other villages can only be reached year round by aircraft.



<u>Tribal Entities:</u> There are ten federally recognized Tribal Entities within ASTAC's serving area. Each of the seven villages and Barrow has a Native Village organization. Arctic Slope Native Association (ASNA) is the Tribal Entity that manages the Samuel Simmonds Memorial Hospital in Barrow and the inuplat Communities of the Arctic Slope (iCAS) serves as an "umbrella" government for eight remote inuplat villages known as the inuplat "community" spread out along the Arctic Ocean and in the interior, just above the Arctic Circle.

The Process: Following the guidelines in DA 12-1165, ASTAC's Executive Leadership Team made multiple attempts to either coordinate telephonic meetings for Tribal Engagement or meet the requirement through proxy of the engagement process by the tribal entity to the village's elected Director to the ASTAC Board. Tribal leadership points of contact were updated to reflect current information (12011). A cover letter was created to explain the new process and asking for the Tribal Entity's cooperation in meeting our Tribal Engagement obligations. The cover letter borrowed heavily from DA 12-1165. The cover letter was attached to a Tribal Pre-meeting questionnaire which also extracted the questions from DA 12-1165 for Native leaders to consider prior to the telephonic engagement meeting. These two documents were sent on October 17, 2014. An example of the cover letter and a blank Tribal Pre-meeting Questionnaire can be found at (12011).

The cover letter and pre-meeting questionnaire did not elicit a response from any of the Tribal entities who have not asked to be represented by their Triba's Director on the ASTAC Board. Following the mailing of the first letter, ASTAC had a regularly scheduled Board meeting on October 22d, where the Board approved numerous ongoing engagement items. Minutes for the Open portion of the meeting, including Board approval of engagement activities can be found at (Table 1). At this same Board meeting, Directors residing in the 5 communities who had been non-responsive to the engagement interaction were asked to do a personal follow up with the Tribal entity and all agreed to do so. The next step in the process was to do a second mailing of the engagement letter on December 10, 2013 with a cover letter reintroducing what we were trying to achieve (Table 1). Following this mailing, Charlie Carpenter, Chief of Network Operations requested a telephonic meeting. Telephonic logs for each Tribal Entity who did not proxy representation to their elected Director can be found at (Table 1).

Following multiple attempts to engage Tribal Leadership from October through December 2014, we were successful in connecting with 60% (six) of the ten Tribal entities. A recurring theme that was expressed in 2012 through 2014 was the appropriateness of using the ASTAC elected Board member as a representative of many of the Tribal entities, since the Board member is also a member of the Tribal entity, has received telecom specific training, and sets the direction for the Cooperative based on the will of the people who elect them. We received a written request to do so from the Native Villages of Barrow and Wainwright and verbal authorization from the Native Villages of Kaktovik, Nuiqsut, Point Hope, and Anaktuvuk Pass

I certify that the above description of ASTAC's Tribal Engagement is a fair and accurate documentation of our afforts and that a copy of this certification has been provided via USPS to all of our Tribal entities.

My Marian

December 81, 2014

Stephen L. Merriam, CEO

Date

2014 Tribal Leadership Roster

ICAS-Barrow Doraen Lampe, CEO

ASNA Maria Carroll, Director

Native Village Tribal Council-Presidents

Thomas Olemaun
Edward Rexford Sr.
Howard Patkotak
Margaret Pardue
Jack Schaffer
Margaret Ahngasak
Margaret Ahngasak
Barrow
Kaktovik
Walnwright
Nuiqist
Pt. Hope
Atqasuk

Margaret Ahngesak
Pres. Village Council Anaktuvuk Pass Individual stepped down, no one at this time

Leo Ferreira Pt. Lay



Arctic Slope Telephone Association Cooperative, Inc.: 4300 B Simet, Suite 501, Auchorage, AK 99503

. 907-569-3989 . 1-800-478-6409 . 1-907-563-1932

October 17, 2014

THEFT

Mr. Howard Patkotak, President Viliage of Wainwright P.O. Box 143 Wainwright, AK 99782

Dear Mr. Patkotak;

This letter is intended to help facilitate engagement between Tribal government officials and ASTAC, which provides service on Tribal lands with the use of Universal Service Fund (USF) support. In 2012, ASTAC met with all tribal entities on the North Slope. Based on feedback we received from Tribal leadership, we are amending our process to better collaborate with you.

A number of tribal antities pointed out that ASTAC has an elected Director to our Board representing your community. All Directors receive extansive industry training in telecommunications, meet four times yearly to set direction for the Cooperative and could petantially be a great resource in directing the Cooperative relative to your planning. It was highly suggested that the Director coordinate with you and speak for your tribal entity, engaging the Cooperative management team on your behalf. This would be much more responsive to your evolving needs due to the quarterly standing Board meetings where you could be represented. It would also save the memberahip a significant amount of money. For instance, in-person tribal engagement in 2012 cost the Cooperative almost \$28,000. Five of the ten tribal entities for the North Slope have adopted this approach in 2013, saving the membership significant money better used to upgrade the network for future offerings.

If this alternative approach makes sense to you, please email me at stovo@astac.net and confirm your interest in using our Board member as your organization's representative for telecommunications issues, and we will take it from there. Thanks for your consideration of this tailored approach.

Best Regards,

Stephen Merriam, CBO

ASTAC, Serving the North Slope of Alaska since 1980

Tribal Government Pre-Meeting Questionnaire

Needs Assessment and Deployment Planning

What are the Tribe's communications goals, needs, and priorities, as well as what the Tribe intends to do with communications services?

What core community or anchor institutions are central to deployment and what in the nature and operations of these institutions is relevant to the need for communications services?

Are there economic factors and possibly Tribally-driven opportunities that will assist in making the business case for deployment on Tribal lands, as well as opportunities where Tribal governments and communications providers can partner.

ASTAC has an elected Director to our Board representing your community. All Directors receive industry training in telecommunications, meet four times yearly to set direction for the Cooperative and could potentially be a great resource in directing the Cooperative relative to your planning. Would you like the Director to speak for your tribal entity and engage the Cooperative management team on your behalf?

Feasibility and Sustainability Planning

Are there specific challenges associated with deploying and sustaining a communications network on your lands?

Many federal grant or loan programs provide direct access to, or particular standing for, Tribal Nations and their entities. That is, there are federal government programs that support Infrastructure deployment and support the economic, health, safety, and welfare missions in Native communities. Are there any additional resources the Tribal entity may bring to bear in feasibility and sustainability planning for communications services?

Marketing Services in a Culturally Sensitive Manner

The Tribal engagement obligation provides Tribal governments and ASTAC with the opportunity to discuss and explore ways in which we can coordinate or partner to ensure that services are marketed in a manner that will relate directly to the community, resonate with consumers, and stimulate increased adoption of services on Tribal lands.

Would you be interested in developing materials, separately or jointly, specific to the Tribal community?

Would you like to review and comment on our marketing materials as part of the development process?

What other elements of our respective arganizations may need to be engaged? For Tribai governments, this may mean administrative planning, community service, and other governmental offices. For ASTAC, this may mean customer service, technical assistance, and commercial business divisions.

Rights of Way and Other Permitting and Review Processes

There are numerous regulatory processes with which ASTAC must comply in order to provide communications services on Tribal lands, including rights of way, land use permitting, facilities siting, and environmental and cultural review processes.

Are there additional regulatory processes beyond those practiced and disclosed by ASTAC that should be incorporated in serving Tribal lands?

Compliance with Tribal Business and Licensing Requirements

As sovereign institutions, Tribal governments have the authority to impose Tribal business and licensing requirements on all entitles doing business on their lands. The form of these licenses vary greatly, including certificates of public convenience and necessity, Tribal business licenses, master licenses, and other related forms of Tribal government licensure.

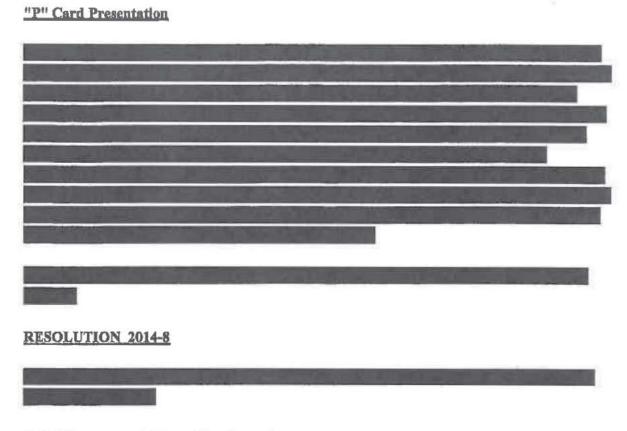
Please provide a comprehensive list of any business and licensing requirements applicable to the provision of the cooperative's communications services, including an explanation of precisely what all such requirements entail, specific application procedures and timeframes, as well as the governmental offices involved in the licensing process. As part of this process, ASTAC will provide you with a list of existing licenses in place, as applicable.

MINUTES OF THE OUARTERLY MEETING OF THE BOARD OF DIRECTORS OF ARCTIC SLOPE TELEPHONE ASSOCIATION COOPERATIVE, INC. HELD OCTOBER 22, 2014 IN THE CONFERENCE ROOM OF THE COOPERATIVE IN ANCHORAGE, ALASKA

all to Order	
toll Call	
ocation	
pproval of Agenda	
ttorney's Report	
	-

A STATE OF THE RESIDENCE OF THE PARTY OF THE
Approval of the Regular and Executive Meeting Sessions
Chief Services Officer's Report
SALUE DEL TIMOS SALUES
She reminded the board that
in light of the cooperative's tribal engagement responsibilities, marketing efforts were focused on the cultural sensitivities and traditional activities undertaken in the cooperative's service areas. With that background, she reported that July marketing activities included distribution of information regarding flex plans, the availability of the Samsung Galaxy S5 cellular telephone and the rollout of the new webmail system. Activities for August included the installation of a new lighted sign on the Barrow sales office, refreshment of the logo and ASTAC brand and the preparation of sports posters for the upcoming sports season. September activities included preparation of the 2015 calendar and telephone directory, the village SWOOSH promotion in six of the nine service areas, installation of mission and vision plaques in the office and the preparation of additional sports-related ads.
The board expressed its approval to both the ongoing and proposed marketing efforts described by Jodi Forsland and she was thanked for her report.
Chief Network Officer's Report
He indicated that the network
department, in an effort to satisfy ongoing needs assessment and deployment planning for communication services in the cooperative service areas, undertook a number of plant-related activities during the third quarter

	He also reported
on recent Quintillion efforts to begin installation of shore-based facilities to sundersea fiber optic cable project. The board expressed approval of the plan ongoing assessment and deployment efforts and thanked Mr. Carpenter for h	support the planned at department's
Executive Session	
Break	
Board Action on Executive Session Matters	
RESOLUTION 2014-05	
RESOLUTION 2014-06	
RESOLUTION 2014-07	



Tribal Engagement Committee Report

President Aiken asked Steve Merriam to provide the committee report.

Mr. Merriam reminded the board that the FCC and related entities had issued further guidance on tribal government engagement obligations of telecommunications carriers in a release dated July 19, 2012. Incompliance with the requirements of the guidance, the cooperative developed an ongoing strategy for needs assessment and deployment planning, feasibility and sustainability planning, the marketing of services in a culturally sensitive matter, compliance with tribal rights of way and other permitting processes, and compliance with tribal business and licensing requirements. He indicated that each department of the cooperative now focus its efforts with respect to these matters.

Steve Merriam also reported that the cooperative had identified ten tribal entities that exist within the cooperative's service area. He indicated that an effort was made, initially inperson, and later by correspondence, to contact each group individually to initiate the needs assessment process. As a result of meetings with a number of the tribal entities, it was determined that the best method of interaction with the tribal entities was for each entity to appoint the board

member responsible for the service area in which the tribal entity was located as its primary point of contact with the cooperative. And that way, the board member could communicate the ongoing activities of the cooperative to the tribal entities which, in turn, would communicate tribal entity needs to the cooperative. Mr. Merriam indicated that to date, his received letters approving this mode of interaction from five of the ten tribal entities. He indicated that efforts were underway to determine whether this plan of attack would work with the remaining entities. He also asked the Board members in these communities to reach out to the remaining five tribal entities that have not responded to numerous attempts to engage and start that dialogue. The responsible Directors unanimously agreed to do so.

ard Committee Status Report	
lage Concerns	
	H

Tab3

REDACTED FOR PUBLIC INSPECTION

Geneval Interest Items
<u>Adjournment</u>
Date:,2014
ATTEST:



Arcile Slope Telephone Association Cooperative, Inc. 4300 B Sieer, Seite 501, Archarage, AK 99503 907-563-3989 1800-478-6409 1907-563-1932

December 10, 2014

KHET

Mr. Howard Patkotak, President Village of Wainwright P.O. Box 143 Wainwright, AK 99782

Dear Mr. Patkotak;

This letter is intended to help facilitate engagement between Tribal government officials and ASTAC, which provides service on Tribal lands with the use of Universal Service Pund (USF) support. In 2012, ASTAC met with all tribal entitles on the North Slope. Based on feedback we received from Tribal leadership, we are amending our process to better collaborate with you.

A number of tribal entities pointed out that ASTAC has an elected Director to our Board representing your community. All Directors receive extensive industry training in telecommunications, meet four times yearly to set direction for the Cooperative and could potentially be a great resource in directing the Cooperative relative to your planning. It was highly suggested that the Director coordinate with you and speak for your tribal entity, engaging the Cooperative management team on your behalf. This would be much more responsive to your evolving needs due to the quarterly standing Board meetings where you could be represented. It would also save the membership a significant amount of money. For instance, in-person tribal engagement in 2012 cost the Cooperative almost \$28,000. Five of the ten tribal entities for the North Slope have adopted this approach in 2013, saving the membership significant money better used to upgrade the network for future offerings.

If this alternative approach makes sense to you, please small me at stove@astac.net and confirm your interest in using our Board member as your organization's representative for telecommunications issues, and we will take it from there. Thanks for your consideration of this tailored approach.

Best Rogards,

Stephen Merriam, CEO

ASTAC, Serving the North Slope of Alaska since 1980

Tab 5 - Tribal Engagement Telephonic Recurd NV Attasuk

Your initials	88	8	8	8
Summary of conversation . She said Della Shugkuk is the President and she is	out of town Number I called for Paul fast year out of service	Number from phone directory - Paul is out of town	He said Della Shugjuk is President of the Native Village of Atyssuk and Maganet is with corp	
Person you spake with number not in service	Katherine number out of service	Man answered	Herman Kignak	fing no answer
Vate Time Called Number 12/17/2014 10:50am 907-639-2535	12/17/2014 4:27pm 907-633-2575 12/18/2014 11:20em 907-633-2330	12/18/2014 11:24am 907-633-3679	12/18/2014 11:35am 907-633-6422	11:10 907-633-2575
Time 10:50am	11.20em	11:24am	11:35am	
Date 12/17/2014	12/17/2014	12/18/2014	12/18/2014	12/22/2014

Tab 5 - Tribal Engagement Telephonic Record ASNA

Your initials to	88
Summary of conversation Mane Carroll - left voice message for ther to call with the idea that I was checking for her reaction to	voman Steve two letters. Voman forwarded to MC left voice message again and my call back rember
Person you spoke with	woman woman forwarded to MC
Called Number	r 907-852-4611 r 907-852-4611
Time	/18/2014 11:47ai /22/2014 11:54ai
Date	02/22/21

Tab 5 - Tribal Engagement Telephonic Record NV Point Lay

Your initials	3	8
	Said he has my message, hold her it was about	reutils store there was been agained a second
5	erswering machine	Eunis
Time Called Number	12/17/2014 10:38am 907-833-2575	12/22/2014 11:14am907-833-2575
Date	12/12/201	100/cd/cs

Tab 5 - Tritoal Engagement Telephosis: Record ICAS

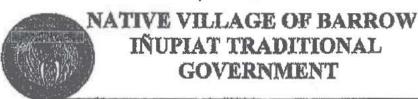
Summary of conversation left message and my number for Doreen Lampe Person you spoke with answering machine Date Time Called Number 12/22/2014 11 40am 907-852-4227

Your initials CC

Tab 5 - Tribal Engagement Telephonic Record NV Waimwright

Your initials		8	8
Summary of conversation She gave me his email address and confirmed he	was President of the Native Village of Walnumght.	hapatkotak@gail.com lemailed Howard	left message for Howard to call me
Person you spoke with		Sonia	answering machine
Called Number		n907-763-2535	m907-763-2535
Time		A 10543ar	Ā
Date		12/17/2014 10:48	12/22/2014 11-5

TAB 6



December 13, 2013

Charles Carpanter Arctic Slope Telephone Association Cooperative, Inc. 4300 B Street Suite 501 Anchorage, AK 99503

Dear Charlia,

I am writing this letter in response to ASTAC's request that the Native Village of Barrow designate ASTAC's elected board member from Barrow as our representative for telecommunications issues. I do support this alternative approach to tribal engagement as a means of getting the necessary input in the most cost effective manner with representation from the most knowledgeable and qualified member of our community.

You may contact me at 907-852-4411 if you have any questions.

Cordially,

Thomas Olemaun, Executive Director/President

---TAB6:

WAINWRIGHT TRADITIONAL COUNCIL

January 16, 2015

To: Stephen Merriam

4300 B Street, Suite 501 Anchorage, AK 99503

RE: Confirmation of WTC Council member to represent the Tribe on behalf of the Wainwright Traditional council

This letter is to confirm our agreement to have the existing Walnwright representative for ASTAC, also represent the Tribe, as he sits on the Walnwright traditional council as a member.

If you have any questions or concerns, please contact our office at the phone numbers below or via email.

Thank you,

Heward Patkotak WTC Presidenti

> PO BOX 143 * 1212 AIRPORT ROAD * WAINWRIGHT, ALASKA 99782 PHONE: (907)763-2575 * FAX: (907)763-2576 Veronica-morales@inuplatgov.com

ANCHORAGE OFFICE

4800 B Street, Suite 501 Anchorege, Alaska 99503 1-800-478-6409 Fax: 907-563-3394



Web: www.astac.net Email: info@astac.net

BARROW OFFICE

1078 Kingsk Street Barrow, Alaska 99723 907-852-7100 Fax: 907-852-0006

LIFELINE AND LINKUP ASSISTANCE APPLICATION Annual Certification is Required

Check applying for: Local Service Assistance OR Wi	raless Servica Assistance
Verify your tiletility: 1. Complete Section A: Personal information 2. Complete Section B <u>OR</u> Section C (not both) 3. Complete Section D: Initial, Sign, and Date 4. Attach a copy of your documents to support your eligibility 5. Raturn Application and Documents to ASYAC 4900 B St, Suite 501, A. PERSONAL INFORMATION	Anchorage, AK 99503 / Fax; 907-563-3394 or 907-852-0006
The person applying for Lifeline service MUST BE the same person who q	qualifies for the Lifeline benefits AND listed on the telephone bill.
CUSTOMER FIRST AND LAST NAME	
MAILING ADDRESS City, State, Zip Code	
"Niein" Liteline Telephone Number	
PHYSICAL ADDRESS City, State, Zip Code (NOT PO Box)	
Dets of Birth: Month Day Year (Required) mm dd yyyy	Chack here if service address is temporary
Social Security Mumber:	
Tribal Lifelina: Single party, voice grade access to the public switched nei interexchange services (unless toll blocking is chosen), access to director	twork, access to emergency services, access to operator services, access to y assistance, and toll blocking (if requested).
the maximum federal assistance available. The supported services under	er will receive assistance for 100% of connection fees up to \$100,00. This is this section do not include charges essessed for facilities or equipment tremises equipment and inside wiring charges. Any additional installation ser. Expanded Link-Up Service assistance shall be provided a subsequent
Check applying fors Tribal Lifetine (monthly reoccurring	charge) Tribus Link Up (Installation charges)
	ASTAC CSR: Proof of Eligibility
	Received and Effective Date(s):
	Date

B. PROGRAM-BASED ELIGIBILITY

Check all program(s) in which you or a member of your household is currently annoticed. YOU MUST PROVIDE PROOF OF PROGRAM PARTICIPATION. This could include a copy of your benefit ID card, a copy of an eligibility letter from an authorized agency or prior year's statement of banefits. (Do not send original documents.)

	E12 - State Assistance Programs (if Applicable)
E1 - Medicald	Alaska Adult Public Assistance
E2 - Supplemental Nutrition Assistance Program (Food Stamps or SNAP)	Alaska Heating Assistance Program
E3 - Supplemental Security Income (SSI)	Alaska Public Housing
24 - Federal Public Housing Assistance (Section 8)	Alaska Senior Care
25 - Low-Income Home Energy Assistance Program (LIHEAP)	Alaska Temporary Assistance Program (ATAP)
E6 - Temporary Assistance to Needy Femilies (TANF)	Child Care Assistance (PASS I. II. III)
87 - National School Lunch Program's Free Lunch Program	Denall Kid Care
E8 - Burgau of Indian Affairs (BIA) General Assistance	Pioneer Home Payment Assistance
E9 - Initially administered Temporary Assistance to Needy Families (TTANF)	Sr. Citizen Housing Development Fund
E11 - Head Start lincome bussed criteria conty)	E13 - Eligibility Based on income (see Section C)
	E14 - Program Eligibility Approved by State Administrator
	Home Investment Partnership Program ("HOME")
Documentation will NOT be returned and proof will be shredded	☐ Interest Rate Reduction for Low Income Borrower
	Low Income Housing Tex Credit Program
	YA Disability Pension
	WIC - Woman Infants and Children Program
F THE PARENT CUALIFIES FOR THE BENEFITS DUE TO A MINOR CHILD, THEN MINORS' INF	DIS NEEDED AS THE "REMEETS OUGLEVING PERSON"
1 7540 Christian advisorings, Legis 4119 period yes bear on Libertan and sense 111941 streamings.	
Minoritative not to a variety of the second	Special Security Sumbi
Section 1 of the Control of the Cont	

Calculate TOTAL household income by reporting the income of all adult persons residing in your home in the appropriate category:

Income Source	Amount	2015 POVERTY GUIDELINE	S FOR ALASKA
Prior year's State, Federal or Tribal tax return OR		Persons in family/household	Poverty guideline
Social Security; Retirement income		1	\$14,720
Alimony or Child Support Wages Bureau of Indian Affairs General Assistance		2	19,920
		3.	23,120
		4	30,820
Unamployment; Worker's Compensation		5	35,520
TOTAL		6	40.720
TOTAL		7	45,920
You must attach proof of income as reported above, examples include:			51,120
		For families/households with more the	
 Prior year's State, Federal or Tribal tax return OR Most recent statement from each type of current income source(a) n 			WWW

- Three consecutive menths' worth of your most current pay stubs
- from all employers
- Social Security statement of bonefits
- Weterans Administration statement of benefits
- Retirement/Pension statement of benefits

- Unemployment/Worker's Compensation statement of benefits
- Child Support documentation
- · Federal or Tribal notice letter of participation in Bureau of Indian Affairs General Assistance OR
- = Djvorce Decree

D. SIGNATURE (This section must be filled out completely)

Please read the following statements, initial by each sentence, and sign below. [Disclosure Statement: Perfury and false statements are punishable by fine and/or imprisonment under Title 18 of the U.S. Code.]

By signing below, I certify under penalty of parjury, to each and every one of the following:

documentation of eligibility;	Lity criteria for receiving Lifeline, provided in 47 C.F.R. Section 54,409. I have provided in 47 C.F.R. Sectio	
	ason, I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I i or receiving Lifeline support, I am receiving more than one Lifeline benefit, or anoth	
4. If I move to a new address, I will provide that new		
5. If I provided a temporary residential address to the	a telephone company, I will be required to verify my temporary residential address	i
6. My household will receive only one (1) Lifeline senservice;	vice, and, to the best of my knowledge, my household it not already receiving a Life	eline
continued eligibility will result in de-enrollment and the tere 8. I scknowledge that providing false or fraudulent in	ny continued eligibility for Lifeline annuelly, and my fellure to re-certify as to my mination of my Lifeline benefits pursuant to 47 C.P.R. Section 54.405(e) [4]; formation to receive Lifeline benefits is punishable by law; and	
	ertification form is true and correct to the best of my knowledge. flon will be given to USAC and/or its agents for purpose of verifying that my housel rable.	hold
Do you or does anyone in your household h	ave any disabilities that may inhibit access to service offerings?	
x		
Customar Signature	Date	
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54.313 Lifeline customers MOU and additional toli charges

Lifeline subscribers receive the same residential service as a regular subscriber, but at a reduced monthly recurring rate. Thus, lifeline subscribers have an unlimited number of local calling minutes. As for toll, lifeline subscribers, similar to every Arctic Slope Telephone Association Cooperative, inc. subscriber, are free to choose their own toll usage plans through IXCs that serve Arctic Slope Telephone Association Cooperative, inc.



Arctic Slope Telephone Association Cooperative, in 4300 B Steel Suite 301 Audigraps (4K.99909 907.569.3989 11800.478.6409 11907.653-1952

Date: July 1, 2015

Ms. Mariene H. Dortoh Secretary: Federal Communications Commission 9300 Bast Hampton Drive Capitol Heights, MD 20743

Re: WC Docket No. 14-58, 2015 Annual Report, Form 481 for High-Cost Recipient 54,313(f)(I) "Milestone Cortification"

Dear Ms. Dortchi

In compliance with the filling requirements associated with, and attached to Form 481, we wish to advise fite Commission that Arctic Slope Telephone Association Cooperative, Inc. provides High Speed Internet service to its customers which:

- Figs taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 4 Mons downstream/I Mons unstream in those areas with sufficient percential backhault otherwise at the IM download/256k upload non-terrestrial speed as clarified in the Commission's Third Order on Reconsideration;
- In those areas with terrestrial backhaul, provides latency suitable for real-time applications including VoiP and usage capacity which is reasonably comparable to those in urban areas and;
- . That reasonable requests for service are met within a reasonable timeframe.

If there are questions, I may be contacted at 907-564-2680.

Sincerely,

Clover MoNail

Chief Financial Officer

Clover insmul

Arotic Slope Telephone Association Cooperative, Inc.

4300 B Street, Suite 501

Anchorago, AK 99503

clover@astro.net

ANCHOR INSTITUTIONS WITHIN ARCTIC SLOPE TELEPHONE ASSOCIATION COOPERATIVE, INC. TERRITORY

Access to broadband services was available prior to 2014 to all known anohor institutions. All requests for broadband services, and speed, were fulfilled in 2014. Arctic Slope Telephone Association Cooperative, Inc. continues to monitor customer demand and technological innovation, planning to size its network in anticipation of requests for higher speed broadband services.

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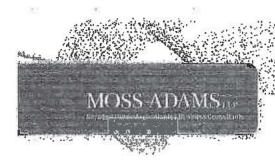
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REPORT OF INDEPENDENT AUDITORS

Hoard of Directors Arctic Slope Telephone Association Cooperative, Inc.

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of Arctic Slope Telephone Association Cooperative, Inc. (Cooperative) and its subsidiaries, which comprise the consolidated balance sheets as of December 31, 2014 and 2013, and the related consolidated statements of income, comprehensive income, members' equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial attements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misetatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of meterial misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design sudit procedures that are appropriate for the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

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REPORT OF INDEPENDENT AUDITORS (continued)

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Optnion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Arctic Slope Telephone Association Cooperative, Inc. and its subsidiaries as of December 31, 2014 and 2013, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Moss Adams LLD

Spokans, Washington February 19, 2015